

# Exhibit 4

1 UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
2 EASTERN DIVISION  
3

IN RE: NATIONAL )  
4 PRESCRIPTION ) MDL No. 2804  
OPIATE LITIGATION )  
5 \_\_\_\_\_ ) Case No.  
 ) 1:17-MD-2804  
6 )  
THIS DOCUMENT RELATES ) Hon. Dan A.  
7 TO ALL CASES ) Polster  
8

TUESDAY, JANUARY 8, 2019

9  
HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
10 CONFIDENTIALITY REVIEW

11 - - -

12 Videotaped deposition of Ginger  
13 Collier, held at the offices of STINSON  
14 LEONARD STREET LLP, 7700 Forsyth Boulevard,  
15 Suite 1000, St. Louis, Missouri, commencing  
16 at 9:10 a.m., on the above date, before  
17 Carrie A. Campbell, Registered Diplomate  
18 Reporter and Certified Realtime Reporter.  
19

20  
21  
22 - - -

23  
GOLKOW LITIGATION SERVICES  
24 877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com  
25

1 QUESTIONS BY MR. GOTTO: 15:25:13

2 Q. Okay. And that would -- were 15:25:13

3 those rebates being suspended with respect to 15:25:15

4 oxy 15 and 30 sales? 15:25:22

5 A. I wanted them suspended for all 15:25:23

6 products. 15:25:25

7 Q. Okay. Did that happen? 15:25:25

8 A. I believe we did. 15:25:27

9 Q. Okay. And what was the reason 15:25:28

10 for that? 15:25:32

11 A. I just didn't think that 15:25:33

12 Mallinckrodt had value in offering an 15:25:34

13 additional discount to some of these 15:25:36

14 customers. They would just get additional 15:25:39

15 rebate for doing nothing, basically. So we 15:25:42

16 just didn't see that there was value in doing 15:25:47

17 that. 15:25:49

18 Q. Okay. And then in the top 15:25:49

19 e-mail on the first page from Lisa Cardetti, 15:25:56

20 she says, "Originally we were going to 15:25:56

21 exclude all oxycodone. Just wanted to verify 15:26:01

22 that we will only be excluding 15 and 30." 15:26:02

23 Now, do you understand her 15:26:05

24 there to be talking about excluding from the 15:26:08

25 VIP program? 15:26:13

1	A.	Yes.	15:26:14
2	Q.	Okay. And which was it? Was	15:26:14
3		it excluding all oxycodone or just 15 and 30;	15:26:17
4		do you know?	15:26:20
5		MR. O'CONNOR: Object to form.	15:26:20
6		THE WITNESS: I believe it	15:26:21
7		became only the 15 and 30. We	15:26:23
8		remained with the 5 milligram.	15:26:25
9		QUESTIONS BY MR. GOTTO:	15:26:29
10	Q.	Okay. You can set that aside.	15:26:29
11		(Mallinckrodt-Collier Exhibit	15:26:30
12		29 for identification.)	15:26:59
13		QUESTIONS BY MR. GOTTO:	15:26:59
14	Q.	Exhibit 29 is a two-page	15:26:59
15		document beginning at Bates	15:27:01
16		MNK-T1_0001553297. It appears to be a mailer	15:27:08
17		concerning a CME presentation.	15:27:14
18		Do you recognize this document?	15:27:22
19	A.	No, I do not.	15:27:24
20	Q.	Do you recall having any	15:27:25
21		familiarity with any CME presentations	15:27:37
22		concerning opioid rotation?	15:27:42
23	A.	Not the specific CE. We did	15:27:45
24		discuss doing continuing education.	15:27:51
25	Q.	On this topic?	15:27:52

1	MR. O'CONNOR:	Object to form.	15:27:53
2	THE WITNESS:	I don't remember.	15:27:54
3	QUESTIONS BY MR. GOTTO:		15:27:55
4	Q.	Okay. Do you know what opioid	15:27:55
5		rotation means in the context of this mailer?	15:27:57
6	A.	No, I do not.	15:28:00
7	Q.	Okay. And down toward the	15:28:02
8		bottom of the mailer it says, "This activity	15:28:04
9		is funded through an educational grant from	15:28:06
10		Mallinckrodt/Covidien."	15:28:11
11		Do you see that?	15:28:12
12	A.	Yes.	15:28:13
13	Q.	And educational grants of that	15:28:13
14		type, is that something that was handled by	15:28:17
15		the marketing department?	15:28:20
16	A.	Not in my group, because this	15:28:21
17		is targeting physicians. We don't target	15:28:25
18		physicians at all. We don't even talk to	15:28:27
19		them.	15:28:29
20	Q.	Okay. So whatever educational	15:28:29
21		grant underlay this presentation would have	15:28:33
22		been something that someone else handled?	15:28:35
23	A.	Correct.	15:28:37
24	Q.	Okay. All right. You can set	15:28:37
25		that aside.	15:28:41

1	(Mallinckrodt-Collier Exhibits	15:28:55
2	30 and 31 marked for identification.)	15:28:56
3	QUESTIONS BY MR. GOTTO:	15:28:56
4	Q. We've marked as Exhibit 30 a	15:29:23
5	single-page document, MNK-T1_0004673096, and	15:29:54
6	as Exhibit 31, a single-page document bearing	15:30:01
7	the next succeeding Bates number.	15:30:06
8	Could you take a look at those	15:30:08
9	materials and tell me if you recognize them?	15:30:09
10	A. I recognize this.	15:30:11
11	Q. The attachment?	15:30:20
12	A. I do.	15:30:21
13	Q. Okay. So in Exhibit 30,	15:30:21
14	Mr. Vorderstrasse sends you an e-mail saying	15:30:26
15	that "working on ideas for McKesson, who was	15:30:28
16	looking for information to show that we were	15:30:33
17	accepted in the market and to give them ideas	15:30:37
18	of selling techniques that have proven	15:30:38
19	successful."	15:30:42
20	And then Exhibit 31 appears to	15:30:42
21	be the attachment to the e-mail; is that	15:30:44
22	right?	15:30:49
23	A. Uh-huh.	15:30:49
24	Q. And so Exhibit 31 has some	15:30:50
25	information about Mallinckrodt historical	15:30:53

1	market share and then "available sales	15:30:55
2	materials, parens, we will likely need PARC,	15:30:59
3	P-A-R-C, approval to send examples."	15:31:02
4	What is PARC in this setting?	15:31:06
5	A. Promotional material review	15:31:07
6	meeting. Promotional advertising review	15:31:10
7	committee.	15:31:13
8	Q. Okay. And that was a	15:31:13
9	Mallinckrodt committee?	15:31:15
10	A. Yes.	15:31:15
11	Q. Were you on the committee?	15:31:15
12	A. No, I submitted materials to	15:31:16
13	them --	15:31:18
14	Q. Okay.	15:31:19
15	A. -- for approval.	15:31:19
16	Q. Who was on the committee; do	15:31:19
17	you know?	15:31:21
18	A. I didn't think I'd ever forget	15:31:21
19	his name, but, no, I don't remember the name.	15:31:26
20	Q. Do you remember what his --	15:31:29
21	A. The key gentleman.	15:31:30
22	Q. Do you remember what	15:31:34
23	his position was?	15:31:35
24	A. He was the lead at PARC, and so	15:31:35
25	he reviewed all communications.	15:31:37